	U.S. DISTRICT COURT DISTRICT OF VERMONT FILED
UNITED STA	ATES DISTRICT COURT 2025 FEB 20 Pm 4: 24
FOR THE DI	ISTRICT OF VERMONT  BY DEPUTY CLERK
UNITED STATES OF AMERICA	) )
v. THEODORE BLAND, JUSTIN DOUGLASS, and DILAN JIRON,	) Case. No.: 2:24-cr-00099 -1-2-3
Defendants	ý)

# SUPERSEDING INDICTMENT

The Grand Jury charges:

### **COUNT ONE**

Between on or about September 7, 2023, and on or about October 15, 2023, the defendants, THEODORE BLAND, JUSTIN DOUGLASS, and others known and unknown to the Grand Jury, knowingly and willfully conspired to distribute cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C))

# **COUNT TWO**

On or about October 12, 2023, in the District of Vermont, the defendant, THEODORE BLAND, knowingly and intentionally possessed with intent to distribute cocaine base and fentanyl, both Schedule II controlled substances.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

### **COUNT THREE**

On or about October 12, 2023, in the District of Vermont, the defendant, THEODORE BLAND, knowingly used and carried a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a Court of the United States, namely, the offenses charged in Counts One and Two.

During the commission of the above-described offense, on October 12, 2023, in the District of Vermont, THEODORE BLAND discharged the firearm.

(18 U.S.C. § 924(c)(1)(A)(i)&(iii))

### **COUNT FOUR**

On or about October 12, 2023, in the District of Vermont, the defendant, THEODORE BLAND, knowingly used, carried, and discharged a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a Court of the United States, namely, the offenses charged in Counts One and Two.

During the commission of the above-described offense, on October 12, 2023, in the District of Vermont, THEODORE BLAND caused the death of Jahim Solomon through the use of the firearm, which killing was a murder as defined in Title 18, United States Code 1111, in that the defendant with malice aforethought, unlawfully killed Jahim Solomon by shooting him with the firearm.

(18 U.S.C. §§ 924(c)(1)(A)(i)&(iii), 924(j), 1111)

### **COUNT FIVE**

On or about October 12, 2023, in the District of Vermont, the defendant, THEODORE BLAND, knowingly used, carried, and discharged a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a Court of the United States, namely, the offense charged in Counts One and Two.

During the commission of the above-described offense, on October 12, 2023, in the District of Vermont, THEODORE BLAND caused the death of Eric White through the use of the firearm, which killing was a murder as defined in Title 18, United States Code 1111, in that the defendant with malice aforethought, unlawfully killed Eric White by shooting him with the firearm.

(18 U.S.C. §§ 924(c)(1)(A)(i)&(iii), 924(j), 1111)

#### **COUNT SIX**

On or about October 12, 2023, in the District of Vermont, the defendant, DILAN JIRON, knowing an offense against the United States had been committed, to wit, that defendant, Theodore Bland, knowingly used and carried a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a Court of the United States, namely, the offenses charged in Counts One and Two, and that during the commission of those offenses the firearm was discharged and resulted in the killings of Jahim Solomon and Eric White, as alleged in Counts Four and Five, did receive, relieve, comfort, and assist the offender, Theodore Bland, in order to prevent the offender's apprehension, trial, and punishment.

(18 U.S.C. § 3)

A TRUE RILL

FOREPERSON

Michael P. Drescher Ju zant MICHAEL P. DRESCHER (JMT/PJV)

Acting United States Attorney Burlington, Vermont

February 20, 2025